

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JONATAN BARAHONA and HECTOR HERNANDEZ,

Plaintiffs,

Case No.: 2:21-cv-
05400 (GRB) (LGD)

-against-

AFFIDAVIT

PARADISE TREE SERVICE & LANDSCAPE, CORP.
and WILLIAM NIETO,

Defendants.

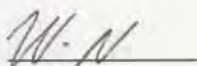
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STATE OF NEW YORK)

s.s.:

COUNTY OF NASSAU)

I, WILLIAM NIETO, do hereby state the following is true, under the penalties of perjury, to the best of my knowledge:

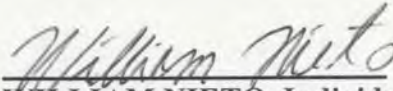
1. I am the President/Owner of PARADISE TREE SERVICE & LANDSCAPE, CORP. ("The Company" Hereinafter).
2. I do not have any time sheets or other time records and payroll records in my possession nor The Company's possession, custody or control and nor do I know of the existence of any records that pertain to work the Plaintiffs allege they performed during the period for which the Plaintiffs claim unpaid wages.
3. I do not have in my possession nor the Company's possession, nor do I know of the existence of any records pertaining to the Company's policies and practices on compensating workers performing the relevant type of work as the Plaintiffs.
4. I have conducted a search for time sheets or other time records and payroll records in mine and The Company's possession, custody or control, that pertain


W.N.

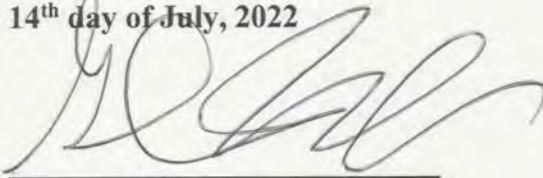
to work the Plaintiffs allege they performed during the period for which the Plaintiffs claim unpaid wages.

5. I conducted a search for records pertaining to the Company's policies and practices on compensating workers performing the relevant type of work as the Plaintiffs.
6. No records were found as a result of the above searches.
7. The searches were conducted at my home and home office located at 193 Lafayette Street, Copiague NY 11726, which is the only place where the Company's records are kept.
8. I do not know of any other place where these records would be if they existed.

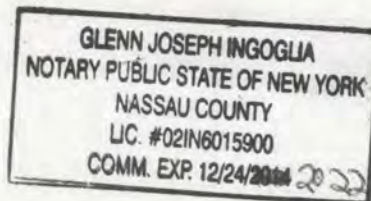
Dated: July 14, 2022

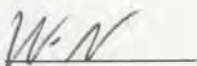

WILLIAM NIETO, Individually
And as President of Paradise Tree
Service & Landscape, Corp.

Sworn to before me this
14th day of July, 2022



Notary Public




W.N.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
JONATAN BARAHONA and HECTOR HERNANDEZ, §
§
Plaintiffs, § Civil Action No.: 2:21-cv-05400
§ (GRB)(LGD)
-against- §
§ AFFIRMATION OF SERVICE
§
PARADISE TREE SERVICE & LANDSCAPE, CORP. §
and WILLIAM NIETO §
§
§
Defendants. §
-----X

I, GLENN J. INGOGLIA, ESQ., declare under the penalty of perjury, on July 14, 2022, I served a copy of the attached AFFIDAVIT of Defendant dated July 14, 2022 upon the following parties/offices at the indicated address(es), by electronic mail at the email address indicated:

Steven J. Moser, Esq.
Moser Law Firm, P.C.
5 E. Main Street
Huntington, New York 11743
(516) 671-1150
steven.moser@moserlawfirm.com

Dated: Island Park, New York
July 17, 2022

THE LAW OFFICE OF GLENN J. INGOGLIA

By: *Glenn Ingoglia*
GLENN J. INGOGLIA, ESQ. (GI 1655)
Attorney for Defendants
PARADISE TREE SERVICE & LANDSCAPE
CORP. and WILLIAM NIETO
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Civil Action No.: 2:21-cv-05400 (GRB)(LGD)
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EASTERN DISTRICT OF NEW YORK

JONATAN BARAHONA and HECTOR HERNANDEZ,

Plaintiffs,

-against-

PARADISE TREE SERVICE & LANDSCAPE, CORP.
and WILLIAM NIETO,

Defendants.

AFFIRMATION OF SERVICE – AFFIDAVIT (07/14/2022)

Signature (F.R.C.P. Rule 11)

Glenn Ingoglia

Print name beneath

Glenn J. Ingoglia, Esq.
THE LAW OFFICE OF GLENN J. INGOGLIA
Attorney for Defendants
PARADISE TREE SERVICE & LANDSCAPE, CORP.
and WILLIAM NIETO
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